

# Exhibit 25

1 W. Timothy Needham (CSB #96542)  
2 Amelia F. Burroughs (CSB #221490)  
3 **JANSSEN MALLOY LLP**  
4 730 Fifth Street  
5 Eureka, CA 95501  
6 Telephone No.: (707) 445-2071  
7 Fax No.: (707) 445-8305

8  
9 *Counsel for Indirect Purchaser Plaintiffs*  
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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 **IN RE: CATHODE RAY TUBE (CRT)**  
16 **ANTITRUST LITIGATION**

Case No. 3:07-cv-5944  
MDL No. 1917

17 **CLASS ACTION**

18 This Document Relates to:  
19 All Indirect Purchaser Actions

**DECLARATION OF AMELIA F.  
BURROUGHS IN SUPPORT OF PLAINTIFFS'  
APPLICATION FOR ATTORNEYS' FEES,  
EXPENSES AND INCENTIVE AWARDS**

Judge: Honorable Samuel Conti  
Courtroom One, 17th Floor

1 I, Amelia F. Burroughs, declare as follows:

2 1. I am an attorney licensed to practice before the courts of California and the  
3 Northern District of California and a partner in the law firm Janssen Malloy LLP. I have personal  
4 knowledge of the facts stated in this declaration and, if called as a witness, I could and would  
5 testify competently to them. I make this declaration in support of my firm's request for attorneys'  
6 fees and reimbursement of litigation expenses, as set forth in Plaintiffs' Application for Attorneys'  
7 Fees, Expenses and Incentive Awards.

8 2. My firm is counsel of record in this case, and represents named plaintiffs Chad  
9 Klebs and Michael Juetten. A brief description of my firm and a biography of each attorney who  
10 worked on this case is attached as **Exhibit 1** and incorporated herein by reference.

11 3. Throughout the course of this litigation, my firm kept files contemporaneously  
12 documenting all time spent, including tasks performed, and expenses incurred. All of the time and  
13 expenses reported by my firm were incurred for the benefit of the Indirect Purchaser Plaintiffs  
14 ("IPPs").

15 4. During the course of this litigation, my firm has been involved in document review  
16 on behalf of the IPPs, including review, categorization, and summary of documents used in class  
17 certification, identification of relevant pricing documents, identification and summary of  
18 documents for use at witness depositions, and preparation of documents used in opposition to  
19 motions for summary judgment. All of this work was assigned and approved by Lead Counsel.

20 5. The schedule attached as **Exhibit 2**, and incorporated herein, is a detailed summary  
21 of the amount of time spent by my firm's partners, attorneys and professional support staff who  
22 were involved in this litigation. It does not include any time devoted to preparing this declaration  
23 or otherwise pertaining to the Joint Fee Petition. The calculation is based on my firm's billing  
24 rates in effect at the time services were performed. Exhibit 2 was prepared from contemporaneous  
25 time records regularly prepared and maintained by my firm and provided to lead counsel. I  
26 authorize those records to be submitted for inspection by the Court if necessary. The hourly rates  
27 for my firm's partners, attorneys and professional support staff included in Exhibit 2 were at the  
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time the work was performed the usual and customary hourly rates charged for services in other class litigation. Those rates are as follows: \$775 per hour for partner W. Timothy Needham, \$550 per hour for partner Amelia F. Burroughs, \$300 per hour for our Associate Shanti Michaels, and \$175 per hour for our paralegal Karen Ellis. Mr. Needham has been involved as counsel in numerous class action cases, including *Lincoln Savings and Loan Litigation*, *In re Cosmetics*, *In re Air Cargo*, *In re Insurance Broker*, *DRAM Litigation*, and *Beal v. Sun Valley Bulb Farm*. Mr. Needham and I were members of the trial team in *Lavender v. Skilled Healthcare Group*, the first case to go to trial to enforce staffing regulations against a skilled nursing home chain on a class-wide basis. In 2011, we received recognition as Trial Lawyer of the Year by *Public Justice* and Consumer Attorney of the Year by Consumer Attorneys of California. Similar rates for my firm have been approved by courts in other cases, including:

- *Montreuil, et al v. The Ensign Group, Inc, et al.*, Los Angeles County Superior Court, Case No. BC449162;
- *Hernandez, et al v. Golden Gate Equity Holdings, LLC, et al.*, San Francisco Superior Court, Case No. CGC-10-505288;
- *Walsh, et al v. Kindred Healthcare, Inc., et al.*, U.S. District Court Northern District of California, Case No. 3:11-cv-00050;
- *Dalao, et al. v. Lifehouse Holdings, LLC, et al.*, Alameda County Superior Court, Case No. RG12660602;
- *Valentine, et al. v. Thekke Health Services, Inc. et al.*, Alameda County Superior Court, Case No. RG10546566; and
- *Correa, et al. v. SnF Management Company, LLC, et al.*, Alameda County Superior Court, Case No. RB13664498.

6. As reflected in Exhibit 2, the total number of hours reasonably expended on this litigation by my firm from inception to May 31, 2015 is 1,822.20 hours, for a total amount billed of \$546,932.50. Expense items are billed separately and are not duplicated in my firm's hourly rates.

1           7.       The expenses my firm incurred in litigating this action are reflected in the books  
2 and records of my firm. These books and records are prepared from expense vouchers, invoices,  
3 receipts, check records and other source materials and accurately reflect the expenses incurred.  
4 My firm's expense records are available for inspection by the Court if necessary.

5           8.       My firm incurred a total of \$15,026.08 in unreimbursed expenses, all of which were  
6 reasonable and necessary for the prosecution of this litigation. Of this amount, \$15,000.00 was for  
7 assessment payments for common litigation expenses or direct payments to experts or other  
8 vendors made at the request of Lead Counsel, and an additional \$26.08 was for non-common  
9 litigation expenses incurred by my firm, such as postage and court costs. A summary of those  
10 expenses by category is attached at the end of **Exhibit 2**.

11  
12           I declare under penalty of perjury that the foregoing is true and correct. Executed this 11<sup>th</sup>  
13 day of September, 2015, in Eureka, California.

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15 Amelia F. Burroughs  
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# EXHIBIT 1

**JANSSEN MALLOY LLP**

730 Fifth Street  
P.O. Drawer 1288  
Eureka, California 95502  
Telephone: (707) 445-2071  
Fax: (707) 445-8305

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**PARTNERS**

W. Timothy Needham  
Michael Morrison  
Dennis C. Reinholtsen  
Michael J. Crowley  
Patrik Griego  
Amelia Burroughs

**ASSOCIATES**

Megan Yarnall  
Jeffrey Slack

**LEGAL ASSISTANTS**

Marla G. Zumwalt  
Nancy Holmes McPartland  
Karen O. Ellis  
Connie Scheckla  
Leslie Ames

**PRACTICE**

Complex civil and business litigation. AV rated by Martindale-Hubbell.

**FIRM BIOGRAPHY**

**Trial Counsel in:**

*Seaman's Direct v. Standard Oil*  
*American Continental Corporation/Lincoln Savings & Loan Securities Litigation*  
*Lavender v. Skilled Healthcare, et al.*

**Class Counsel in:**

*Cosmetics Antitrust Litigation*  
*Carbon Fiber Cases I, II & III*  
*DRAM Cases*  
*In Re: Environmental Technologies Litigation*  
*In Re: Flat Glass Cases*  
*In Re: Laminates Cases*  
*In Re: Natural Gas Litigation*  
*In Re: Pacificare*  
*In Re: Air Cargo Shipping Services Antitrust Litigation*  
*In Re: International Air Transportation Surcharge Antitrust Litigation*  
*In Re: Insurance Brokerage Antitrust Litigation*  
*In Re: Cathode Ray Tube (CRT) Antitrust Litigation*  
*Bates, et al. v. Skilled Healthcare Group, Inc., et al.*  
*Polyester Staple Cases*  
*Sanitary Paper Cases I & II*



*Shuts, et al. v. Covenant Holdco LLC, et al.*  
*Montreuil, et al. v. The Ensign Group, Inc., et al.*  
*Wehlage, et al. v. EmpRes Healthcare, Inc., et al.*  
*Hernandez, et al. v. Golden Gate Equity Holdings, LLC, et al.*  
*Walsh, et al. v. Kindred Healthcare, et al.*  
*Valentine, et al. v. Thekke Health Services, Inc., et al.*  
*Regina, et al. v. Hycare, Inc., et al.*  
*Dalao, et al. v. LifeHouse Holdings, LLC, et al.*  
*Correa, et al. v. SnF Management Company, LLC, et al.*  
*Carnes, et al. v. Atria Senior Living, Inc., et al.*  
*Winans, et al. v. Emeritus Corporation, et al.*

## **ATTORNEY BACKGROUND**

### **W. Timothy Needham:**

Mr. Needham is an experienced trial attorney who has tried over forty jury cases to verdict in numerous courts throughout the State of California. The emphasis of his practice includes class action, antitrust and complex business claims. He is a former president of the Humboldt County Bar Association and is a member of the American Board of Trial Advocates. He is also a member of the Board of Directors of Redwood Capital Bank. Mr. Needham was selected for the California Lawyer of the Year award for 2010 by *California Lawyer Magazine* for his work on *Lavender v. Skilled Healthcare, Group, Inc., et al.*, and was part of a team of attorneys that received the honor of 2011 Trial Lawyers of the Year from the Public Justice Foundation, and was selected Trial Lawyer of the Year by the Consumer Attorneys of California.

### **Amelia F. Burroughs:**

Ms. Burroughs joined the firm in 2007 after practicing in San Francisco and San Diego, and she became a partner at the firm in 2011. Her practice emphasizes employment law, medical malpractice defense, personal injury, consumer and complex litigation. Ms. Burroughs was one of the trial team awarded the honor of The Public Justice Foundation's 2011 Trial Lawyer of the Year, she was selected for the 2011 Rising Stars list for Northern California, and she has been named a Northern California SuperLawyer since 2012. Ms. Burroughs is an honors graduate from CSU, Sacramento (B.A., 1999) and McGeorge School of Law, University of the Pacific (J.D., 2002), where she served as Editor-in-Chief of the McGeorge Law Review (2001-2002). Ms. Burroughs is admitted to all U.S. District Courts in California, as well as the Ninth Circuit United States Court of Appeals. She is the former President of the Humboldt County Bar Association, and she currently serves as the District 1 Governor for California Women Lawyers.

### **Shanti Michaels:**

Ms. Michaels joined the firm as an associate in February 2010. Ms. Michaels received her B.A. with honors from Mount Holyoke College in International Relations and Spanish in 2003 and her law degree from the University of California, Hastings College of Law in 2009. Prior to joining Janssen Malloy, Ms. Michaels worked as an attorney on class actions for Wolf Popper LLP in Puerto Rico. Ms. Michaels has also worked for the California Anti-SLAPP Project and is currently as Associate at Ginn and Crosby, LLP.



# EXHIBIT 2

### INDIRECT PURCHASER PLAINTIFFS

Firm Name	Janssen Malloy LLP		
Reporting Year	2010		

[illegible]

### INDIRECT PURCHASER PLAINTIFFS

Firm Name	Janssen Malloy LLP		
Reporting Year	2011		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Needham, W. Tim	\$ 775.00							0.3						0.3	\$ 232.50
Ellis, Karen	\$ 175.00	0.5												0.5	\$ 87.50
Michaels, Shanti	\$ 300.00	1.7						63.2						64.9	\$ 19,470.00
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		2.2	0.0	0.0	0.0	0.0	0.0	63.5	0.0	0.0	0.0	0.0	0.0	65.7	\$ 19,790.00

### INDIRECT PURCHASER PLAINTIFFS

Firm Name	Jannssen Malloy LLP		
Reporting Year	2012		

Name/Status	Hourly Rate	1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
Michael, Shanti	\$ 300.00	12.5				21.2		833.5		53.8				921.0	\$ 276,300.00
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		12.5	0.0	0.0	0.0	21.2	0.0	833.5	0.0	53.8	0.0	0.0	0.0	921.0	\$ 276,300.00



### INDIRECT PURCHASER PLAINTIFFS

Firm Name			
Reporting Year	2013		

[illegible]



### INDIRECT PURCHASER PLAINTIFFS

Firm Name			
Reporting Year	2015		

[illegible]



**TIME AND LODESTAR SUMMARY**

**INDIRECT PURCHASER PLAINTIFFS**

Firm Name	Janssen Malloy LLP		
Reporting Year	Inception through Present		

Year		1	2	3	4	5	6	7	8	9	10	11	12	Hours	Lodestar
2007		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2008		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2009		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
2010		0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	\$ 232.50
2011		2.2	0.0	0.0	0.0	0.0	0.0	63.5	0.0	0.0	0.0	0.0	0.0	65.7	\$ 19,790.00
2012		12.5	0.0	0.0	0.0	21.2	0.0	833.5	0.0	53.8	0.0	0.0	0.0	921.0	\$ 276,300.00
2013		11.7	0.0	0.0	0.0	602.0	0.0	134.7	0.0	0.0	0.0	0.0	0.0	748.4	\$ 224,520.00
2014		0.0	0.0	0.0	0.0	54.5	0.0	0.0	0.0	0.0	32.3	0.0	0.0	86.8	\$ 26,090.00
2015		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	\$ -
		26.7	0.0	0.0	0.0	677.7	0.0	1031.7	0.0	53.8	32.3	0.0	0.0	1822.2	\$ 546,932.50

**STATUS:**

(P) Partner  
(OC) Of Counsel  
(A) Associate  
(LC) Law Clerk  
(PL) Paralegal  
(I) Investigator

**CATEGORIES:**

1 Attorney Meeting/Strategy  
2 Court Appearance  
3 Client Meeting  
4 Draft Discovery Requests or Responses  
5 Deposition Preparation  
6 Attend Deposition - Conduct/Defend  
7 Document Review  
8 Experts - Work or Consult  
9 Research  
10 Motions/Pleadings  
11 Settlement



EXHIBIT 2

IN RE CATHORADE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

12 Trial TIME AND LODESTAR SUMMARY  
INDIRECT PURCHASER PLAINTIFFS

# EXHIBIT 3

## IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION; MDL NO. 1917

## EXPENSE SUMMARY

## INDIRECT PURCHASER PLAINTIFFS

Firm Name	Janssen Malloy LLP
Reporting Year	Inception through Present

TYPE OF EXPENSE		TOTAL
Assessments		
Outside Copies		
In-house Reproduction /Copies		
Court Costs & Filing Fees		\$ 25.20
Court Reporters 7 Transcripts		
Computer Research		
Telephone & Facsimile		
Postage/Express Delivery/Courier		\$ 0.88
Professional Fees (investigator, accountant, etc.)		
Experts		
Witness / Service Fees		
Travel: Airfare		
Travel: Lodging/Meals		
Travel: Other		
Car Rental/Cabfare/Parking		
Other Expenses CRT Antitrust Litigation Fund		\$ 15,000.00
		\$ 15,026.08